

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-11068-JTD

Jointly Administered

Re: D.I. 1137, 1138, 1226, 1467

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER DENYING
THE AD HOC COMMITTEE OF NON-US CUSTOMERS OF FTX.COM'S MOTION
TO FILE UNDER SEAL (I) THE VERIFIED STATEMENT OF EVERSHEDS
SUTHERLAND (US) LLP AND MORRIS, NICHOLS, ARSHT & TUNNELL LLP
PURSUANT TO BANKRUPTCY RULE 2019 AND (II) THE DECLARATION IN
SUPPORT OF THE AD HOC COMMITTEE OF NON-US CUSTOMERS OF
FTX.COM'S MOTION TO FILE UNDER SEAL THE VERIFIED STATEMENT
OF EVERSHEDS SUTHERLAND (US) LLP AND MORRIS, NICHOLS,
ARSHT & TUNNELL LLP PURSUANT TO BANKRUPTCY RULE 2019**

The undersigned counsel to the Ad Hoc Committee of Non-US Customers of FTX.com (the "Ad Hoc Committee"), hereby certifies as follows:

1. On March 22, 2023, the Ad Hoc Committee filed the *Ad Hoc Committee of Non-US Customers of FTX.com's Motion to File Under Seal (I) the Verified Statement of Eversheds Sutherland (US) LLP and Morris, Nichols, Arsht & Tunnell LLP Pursuant to Bankruptcy Rule 2019 and (II) the Declaration in Support of the Ad Hoc Committee of Non-US Customers of FTX.com's Motion to File Under Seal the Verified Statement of Eversheds Sutherland (US) LLP and Morris, Nichols, Arsht & Tunnell LLP Pursuant to Bankruptcy Rule 2019* (D.I. 1137) (the "Motion to Seal").

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases (collectively, the "Debtors"), a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. On June 8 and 9, 2023, this Court held an evidentiary hearing on the Motion to Seal and the objections filed thereto by the Media Intervenors (D.I. 1226) and the United States Trustee for the District of Delaware (the “U.S. Trustee”) (D.I. 1467).

3. The Court rendered a bench ruling on June 9, 2023, denying the Motion to Seal and directed the parties to confer on a form of order. Attached hereto as **Exhibit A** is a proposed form of order (“Proposed Order”) denying the Motion to Seal. The Media Intervenors and the U.S. Trustee have reviewed the Proposed Order and do not object to its entry.

WHEREFORE, the Ad Hoc Committee respectfully requests that the Court enter the Proposed Order at the Court’s earliest convenience.

[Signature page follows.]

Date: June 7, 2023
Wilmington, Delaware

/s/ Michael A. Ingrassia

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

Eric D. Schwartz (No. 3134)
Matthew B. Harvey (No. 5186)
Paige N. Topper (No. 6470)
Michael A. Ingrassia (No. 7068)
1201 North Market Street, 16th Floor
Wilmington, Delaware 19801
Telephone: (302) 658-9200
Facsimile: (302) 658-3989
eschwartz@morrisnichols.com
mharvey@morrisnichols.com
ptopper@morrisnichols.com
mingrassia@morrisnichols.com

-and-

EVERSHEDS SUTHERLAND (US) LLP

Peter A. Ivanick
Sarah E. Paul
The Grace Building, 40th Floor
1114 Avenue of the Americas
New York, New York 10036
Telephone: (212) 389-5000
Facsimile: (212) 389-5099
peterivanick@eversheds-sutherland.com
sarahpaul@eversheds-sutherland.com

-and-

Erin E. Broderick
227 West Monroe Street, Suite 6000
Chicago, Illinois 60606
Telephone: (312) 724-9006
Facsimile: (312) 724-9322
erinbroderick@eversheds-sutherland.com

-and-

David A. Wender
Nathaniel DeLoatch
999 Peachtree St NE
Atlanta, Georgia 30309
Telephone: (404) 853-8000
Facsimile: (404) 853-8806
davidwender@eversheds-sutherland.com
nathandeloatch@eversheds-sutherland.com

*Counsel to the Ad Hoc Committee of Non-US
Customers of FTX.com*